

Exhibit

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

* * * * *

WEST VIRGINIA RIVERS
COALITION, INC, and
LITTLE HOCKING WATER
ASSOCIATION,

Plaintiffs,

vs.

CIVIL ACTION
NO. 2:24-cv-00701

THE CHEMOURS COMPANY FC, LLC,

Defendant.

* * * * *

Zoom deposition of MONTY FOWLER taken by the
Defendant under the Federal Rules of Civil Procedure in
the above-entitled action, pursuant to notice before
Teresa Reedy, a Registered Professional Reporter, on
the 29th day of July, 2025.

REEDY COURT REPORTING
(304) 615-6725

1 A. No, sir.

2 Q. Are you aware of any other condition that may
3 affect your memory or affect your ability to testify
4 truthfully today?

5 A. No, sir.

6 Q. Okay. Thank you. I want to start with just
7 some general background.

8 What is your current address?

9 A. My current address is [REDACTED] South - and you have
10 to spell the word out - Terrace, Huntington, West
11 Virginia, 25705.

12 Q. Okay. And how long have you lived at that
13 address?

14 A. Almost ten years.

15 Q. Okay. Did -- before that did you live in
16 Huntington also?

17 A. I lived in Cabell County, which is -- and my
18 address has always been Huntington, but it's been like
19 out in the county or in, you know, Barboursville or
20 another small town.

21 Q. Okay. How long have you been a resident of
22 Cabell County, ball park.

23 A. We moved here in August of 1988, I believe,
24 so...

1 chemicals or compounds that Chemours discharges that
2 are at issue in this litigation?

3 MR. SNYDER: Same objection. Go ahead
4 and answer, Mr. Fowler, if you can.

5 A. That's the only one I can recall right now,
6 today.

7 Q. Okay.

8 I think you mentioned this a minute ago.
9 Where do you -- what do you believe is the source of
10 the PFAS contamination in the Ohio River, at least
11 where you live in the Huntington area?

12 A. Your client.

13 Q. Do you think there are any other sources of
14 PFAS contributing to that?

15 A. I don't know.

16 Q. You don't know one way or the other?

17 A. I don't know one way or the other. I am aware
18 of that specific point source.

19 Q. Okay. Has anyone ever told you that you
20 should be concerned about PFAS contamination in the
21 Ohio River?

22 MR. SNYDER: I'm going to object just to
23 the extent that that might go into attorney/client
24 privilege. I don't think it's going to, though, so go

1 ahead, Mr. Fowler, but again don't disclose anything
2 that we may have discussed.

3 A. Any person told me?

4 Q. Sure. Let's start with that.

5 A. No, sir.

6 Q. Okay. And you kind of qualified that as
7 person. Did anything else, any sort of document or
8 publications, or material tell you to be concerned
9 about PFAS contamination in the Ohio River?

10 MR. SNYDER: Object to the form. Go
11 ahead, Mr. Fowler.

12 A. There's been extensive coverage of this issue
13 in the Charleston connect -- Charleston Gazette --
14 excuse me, and other statewide media.

15 Q. As you sit here today, do you recall the --
16 any of those specific stories?

17 A. Specific discrete stories?

18 Q. Yeah, you referenced, you know, I think
19 publication or stories in the Charleston Gazette and
20 other statewide media, and I'm just wondering if you
21 recall any of those specific stories, the titles or
22 when -- or authors, or when they would have been
23 published or anything like that?

24 A. The only thing I can say to that is most of

1 the stories in the Charleston Gazette that I read were
2 written by Ken Ward Jr. Other than that, no, no
3 specifics.

4 Q. And Ken Ward hasn't been at the Gazette for
5 several years; is that right?

6 A. Correct.

7 Q. Do you recall about when he left?

8 A. I do not.

9 Q. But the Charleston Gazette sure still -- sure
10 -- you know, sure to still put their, you know,
11 Pulitzer Prize winning newspaper -- you know, symbol at
12 the top of their -- top of their heading, I guess, you
13 know. So he's still kind of -- they still -- they're
14 still latching onto that even though he's not there
15 anymore.

16 Any other Charleston Gazette articles
17 that come to mind.

18 A. I cannot give you specific titles or dates.

19 Q. Okay.

20 A. I read stories, I recall in general the
21 contents of them.

22 Q. Do you recall generally the time frame when
23 those would have been? And would that have been in Ken
24 Ward's time frame?

1 A. It would have been in Ken Ward's time frame up
2 to the current day. Certainly over the last ten or 15
3 years.

4 Q. Okay. You mentioned other statewide media.
5 What are you referencing there?

6 A. Some of the other newspapers in the state. I
7 can't give you the exact names. I would occasionally
8 see a headline on a TV station's website. That's about
9 all I can recall.

10 Q. Okay. Have you discussed your concerns about
11 PFAS contamination in the Ohio River with anyone?

12 A. Yes.

13 Q. Have you discussed your concerns about PFAS
14 contamination in the Ohio River with anyone other than
15 your counsel in this matter, other than counsel for
16 West Virginia Rivers Coalition in this matter?

17 A. Yes.

18 Q. Who are those people, or groups of people?

19 MR. SNYDER: I'm going to object to
20 relevancy grounds. Again, I think that we're moving
21 far afield here from what Mr. Fowler is actually here
22 for. I'm going to give Mr. Ford some leeway and ask
23 Mr. Fowler answer to the extent he can.

24 A. My wife and I discuss everything Mr. Ford.

1 Q. That's good, and, you know, I'm happy to hear
2 that. I think that's good for a healthy marriage.
3 Anybody besides your wife that comes to mind?

4 A. Not that I can recall.

5 Q. Okay. When did you first begin having
6 concerns related to PFAS contamination in the Ohio
7 River?

8 A. I can't give you a specific date. It's been
9 within the last ten years.

10 Q. And was -- do you recall, was there an event
11 or a story, or what prompted you to have those concerns
12 at that time, if you recall?

13 A. The only thing I can say to that is I'm
14 reasonably sure it was a story in the Charleston
15 Gazette, but specific date, story I can't tell you.

16 Q. Do you think that that would have been a Ken
17 Ward story?

18 A. It may have been. I can't say specifically.

19 Q. Have those concerns that we've been discussing
20 affected your use of the Ohio River?

21 A. Yes.

22 Q. How so?

23 A. My drinking water comes from West Virginia
24 American Water Company, and it has since I moved here

1 in 1988. Their water source is the Ohio River, so I
2 have an awareness and concern about all the pollutants
3 that are in the Ohio River.

4 Q. Do you know where your water is sourced from?
5 Or specifically -- I understand that you said it was
6 the Ohio River, but do you know where on the Ohio
7 River?

8 A. I believe it comes from West Virginia American
9 Water's Huntington treatment plant, but I don't know
10 specifically.

11 Q. Okay. And I want to talk about your drinking
12 water and stuff in a minute, but other than affecting
13 your drinking water, does the -- does your concerns of
14 PFAS contamination in the Ohio River affect how you use
15 the Ohio River in any other way?

16 A. I don't swim in the Ohio River or eat anything
17 from the Ohio River. Other than that, you know,
18 drinking, bathing, doing laundry, household chores,
19 that nature, watering my garden.

20 Q. Why don't you swim or eat -- well, let's
21 start: Why don't you swim in the Ohio River?

22 A. Because it's not clean.

23 Q. Have you ever swam in the Ohio River?

24 A. No, sir.

1 Q. So you never swam in the Ohio River even
2 before you started having these concerns of PFAS
3 contamination in the Ohio River 10 to 15 years ago?

4 A. No, sir.

5 Q. Is that a correct or yes?

6 A. Yeah, I said, no, sir. I have not.

7 Q. Okay. Have you ever eaten anything out of the
8 Ohio River, to your knowledge?

9 A. To my knowledge, no.

10 Q. And why not?

11 A. Because I was aware from the time I moved here
12 that among other things the West Virginia Department of
13 either Health or Environmental Protection issues annual
14 fish consumption advisories for the Ohio River.

15 Q. Okay. And those fish advisories say don't eat
16 fish from the Ohio River or something to that effect?

17 A. They say you can eat the fish at your own
18 risk, but certain classes of people should limit their
19 quantities over time.

20 Q. And you have never eaten fish or anything out
21 of the Ohio River, to your knowledge, I think you
22 testified to.

23 A. Yes.

24 Q. And so that -- strike that.

1 So you didn't eat anything out of the
2 Ohio River even before you had concerns about PFAS
3 contamination in the Ohio River 10 to 15 years ago?

4 A. Correct.

5 Q. Okay. Do you do any sort of -- have you ever
6 done any sort of boating in the Ohio River?

7 A. I have been on a couple of those, like, river
8 cruises where whatever the riverboat was that used to
9 be in Charleston.

10 Q. The P.A. Denny?

11 A. Yeah. That, and another one I can't recall
12 the name of a few times.

13 Q. Not something you do regularly?

14 A. No, sir.

15 Q. Okay. What about any sort of kayaking or
16 canoeing?

17 A. On the Ohio, no, sir.

18 Q. Okay. And I'm guessing you talked about not
19 eating things out of the Ohio, but do you ever fish for
20 sport in the Ohio or have you ever fished -- strike all
21 that.

22 Have you ever fished in the Ohio?

23 A. No, sir.

24 Q. Any sort of tubing or rowing or anything like

1 that in the Ohio? Have you ever done any sort of
2 tubing or rowing or rafting in the Ohio River?

3 A. No, sir.

4 Q. Do you have any plans to recreate on the Ohio
5 River?

6 A. No, sir.

7 Q. Okay. I want to talk about the water -- water
8 issues that you mentioned a minute ago. And you said
9 you had some concerns about PFAS contamination being in
10 your water supply because your water provider sources
11 their river -- or sources their water from the Ohio
12 River. Is that an accurate summary?

13 MR. SNYDER: Objection to the extent that
14 mischaracterizes prior testimony. He said "chemicals,"
15 as well. Go ahead and answer if you can, though,
16 Mr. Fowler.

17 A. Can you repeat the question, please?

18 Q. I think it's fine.

19 MR. FORD: I appreciate that
20 clarification, Dan.

21 Q. Have you ever had any issues with the tap
22 water provided to your house, your home?

23 MR. SNYDER: I'm going to object on
24 vagueness grounds on issues. But go ahead, Mr. Fowler,

1 list of chemicals and substances that are tested for
2 and monitored.

3 Q. Do you know if those -- if that testing occurs
4 before treatment?

5 MR. SNYDER: Objection. Calls for
6 speculation go ahead and answer if you can.

7 A. I have no idea.

8 Q. So you don't know if those testings results
9 are before the water has been treated by the water
10 company or after the water's been treated by the water
11 company?

12 MR. SNYDER: Same objection on
13 speculation. Go ahead and answer.

14 A. I would hope and assume they're testing the
15 water after they treat it so they know what's in it,
16 but I don't know.

17 Q. Okay.

18 Has anyone ever instructed you not to
19 drink or use your water because of PFAS contamination?

20 A. No, sir.

21 Q. So in those mailer yearly sampling results
22 that they send you, it doesn't say to do anything
23 different; is that -- with respect to your water usage;
24 is that fair?

1 MR. SNYDER: Objection. Calls for
2 speculation. Vague. Go ahead and answer if you can,
3 Mr. Fowler.

4 A. I don't recall the wording on the doc -- the
5 annual document.

6 Q. But as you sit here today, you don't recall it
7 saying something to the effect of "Stop using your
8 water because of PFAS contamination."

9 MR. SNYDER: Objection. Calls for
10 speculation. And asked and answered. Mr. Fowler, you
11 can answer again.

12 A. I don't recall.

13 Q. Okay.

14 Do you use your tap water at your house?

15 A. Yes.

16 Q. Do you drink with -- do you drink it?

17 A. I do.

18 Q. Do you cook with it?

19 A. Yes.

20 Q. Do you bathe with it?

21 A. Yes.

22 Q. Do you clean with it?

23 A. Yes.

24 Q. Do you have any sort of filter system or

1 anything like that at your house that you use?

2 A. We have a couple of the Brita filter pitchers
3 that we use for our morning coffee and my wife uses
4 more than I do.

5 Q. When you drink water, do you drink water from
6 those Brita filters, or do you drink it from the tap?

7 A. Both.

8 Q. Is there anything that you don't use your tap
9 water at your house for?

10 A. No.

11 MR. SNYDER: Mr. Fowler, before you
12 answer -- I was going to object to the form, but I
13 heard you say, "no," so let's move on.

14 Q. Have you ever had your tap water at your house
15 tested for PFAS?

16 A. No.

17 Q. Do you know whether there has ever been any
18 PFAS contamination in your water at your house?

19 MR. SNYDER: I'm going to object. Calls
20 for speculation. Mr. Fowler, go ahead and answer if
21 you can.

22 A. Our water's never been tested specifically for
23 PFAS, no.

24 Q. And so your water has never been tested for

1 PFAS, and so you don't know one way or the other
2 whether there's ever been any PFAS contamination in
3 your water; correct?

4 MR. SNYDER: Objection. Calls for
5 speculation. Misstates prior testimony. Mr. Fowler,
6 you can answer if you understand the question.

7 A. Can you repeat the question, please?

8 Q. Sure. Do you know whether there has ever been
9 any PFAS contamination in your water at your house?

10 MR. SNYDER: Same objections.

11 A. I do not.

12 Q. Okay.

13 All right. I want to switch gears a
14 little bit and talk about the clean water act
15 violations at the Washington Works facility.

16 And I think you referenced that you're
17 generally aware of those violations; is that -- is that
18 fair.

19 A. Yes.

20 Q. Do you know the specifics of those violations
21 at all?

22 A. Specifics, no.

23 Q. So you don't know if the -- sure, sorry.

24 A. Sorry.

1 on, Mr. Fowler. Facts not in evidence. Calls for
2 speculation. Calls for a legal conclusion. Go ahead
3 and answer if you can, Mr. Fowler.

4 A. Yes.

5 Q. You would still have concerns?

6 A. Yes.

7 Q. And why is that?

8 A. Because the nature of those chemicals, they
9 are persistent. They do not break down in nature.

10 Q. And I think you testified to this earlier.
11 And I'm sure that Mr. Snyder will call me out on it if
12 I've asked this before, but the basis for you saying
13 that those chemicals don't break down in nature is
14 those various articles that you've read that you
15 mentioned earlier?

16 MR. SNYDER: I'm going to object to the
17 extent that misstates the prior testimony. Mr. Fowler,
18 go ahead and answer.

19 A. Correct.

20 Q. Okay. If Washington Works -- if the
21 Washington Works facility had no more Clean Water Act
22 violations would you still have concerns over PFAS
23 contamination in the Ohio River?

24 MR. SNYDER: Objection. Incomplete

1 A. Hang on one second.

2 (Pause.)

3 Q. And with respect to Paragraph 7, would you
4 have become aware of Chemours' contamination from
5 Washington Works because of those -- as a result of
6 those newspaper articles we discussed earlier?

7 A. Yes.

8 Q. Okay. Anything else?

9 A. Not that comes to mind.

10 Q. Okay.

11 MR. SNYDER: Mr. Fowler, if you could
12 just give me one more second to get an objection on the
13 record, I'd appreciate it.

14 THE DEPONENT: Sorry.

15 Q. Paragraph 9 references a USGS scientific
16 investigation report 2022-5067, "Occurrence of Per- and
17 Polyfluoroalkyl Substances and Inorganic Analytes in
18 Groundwater and Surface Water Used as Sources for
19 Public Water Supply in West Virginia." Are you
20 familiar with that investigative report?

21 A. Yes.

22 Q. How are you familiar with it?

23 A. I read it.

24 Q. Okay. What do you recall about the report?

1 Q. Okay. Paragraph 12 states that "I am aware
2 that West Virginia American Water's Huntington system
3 is older and has had problems in the past with treating
4 pollutants. I am concerned that American Water will
5 not be able to consistently remove the PFAS from the
6 source water before it comes to my tap."

7 Did I read that correctly?

8 A. Yes.

9 Q. What's your basis for that first paragraph or
10 first sentence of Paragraph 12?

11 A. Newspaper stories I have and read and probably
12 some TV website stories that briefly discussed the fact
13 that the treatment plant in Huntington is older.

14 Q. Do you recall any of the specifics of those
15 articles or TV stations or websites?

16 A. Just broadly what I told you.

17 Q. Okay. Nothing to add to what we discussed
18 earlier?

19 A. No, sir.

20 Q. Okay. Do you know what sort of water
21 treatment is in place at West Virginia American Water's
22 Huntington system?

23 A. No.

24 Q. And with respect to the second sentence of

1 Paragraph 12, what is the basis for that assertion?

2 A. What I do understand about the chemicals in
3 question is they are complex manmade chemicals and they
4 are difficult to mitigate through conventional water
5 treatment means, as I understand it.

6 Q. Okay. And, again, the basis for that
7 understanding is the news articles and TV and website
8 articles that we've discussed earlier.

9 A. Correct.

10 MR. SNYDER: I'm going to object --

11 THE DEPONENT: Sorry.

12 MR. SNYDER: I'm going to object to the
13 extent that that mischaracterizes the prior testimony.
14 The answer's out.

15 A. Okay.

16 Q. Paragraph 13 states that "I regularly consume
17 tap water from my home in Huntington and have no
18 treatment system installed to remove PFAS from the
19 water."

20 Did I read that correctly?

21 A. Yes.

22 Q. And we discussed your regular uses of tap
23 water at your home earlier in this deposition; correct?

24 A. Yes.

1 Q. And you stated that you do, in fact, have a
2 Brita filter that you use to filter at least some of
3 your drinking water and coffee -- water for coffee at
4 your home.

5 A. Yes.

6 MR. SNYDER: Object to the extent that
7 mischaracterizes. Mr. Fowler, if you could just give
8 me that one quick second --

9 THE DEPONENT: Sorry. I -- yeah.

10 MR. SNYDER: Thank you.

11 Q. Is the basis for Paragraph 14 of your
12 declaration the same -- the same stuff that we've
13 talked about with respect to Paragraph 12, as far as
14 the source (Zoom glitch) and the worry.

15 MR. SNYDER: Objection. Vague. Go ahead
16 and answer.

17 A. Yes.

18 Q. Is the basis for Paragraph 15 of your
19 declaration the same as Paragraph 14 and 12?

20 MR. SNYDER: Objection to the form, and
21 it's vague. Go ahead and answer if you understand the
22 question, Mr. Fowler.

23 A. Yes.

24 Q. Okay. Paragraph 16 of your declaration states

1 that "My enjoyment of living in the Huntington area is
2 diminished due to a fear of potential PFAS exposure."

3 Did I read that correctly?

4 A. Yes.

5 Q. Could you please elaborate or explain that
6 assertion to me?

7 A. I know these chemicals are in the water I
8 drink and every time I shower or bathe and when I wash
9 our clothes in it. It's in the back of my mind that
10 these are chemicals that modern science has created and
11 does not know how to make safe for humans.

12 Q. I believe you just testified that you know
13 these chemicals are in the water that you drink. I
14 thought earlier you testified that your water had never
15 been tested and you didn't know one way or another
16 whether there were PFAS in the water that comes through
17 your tap.

18 A. I know they find them at the water intake.

19 Q. But you don't know if those are filtered out
20 at your water provider -- the filtration system at the
21 water company; correct?

22 A. Specifically, no.

23 Q. And you don't -- as you sit here today, you
24 don't know whether or not there are PFAS -- PFAS

1 compounds in the water that comes through your tap;
2 correct?

3 A. I do not.

4 Q. Okay.

5 Paragraph 17 states that "I want to
6 reduce my risk of exposure to PFAS as much as possible
7 so as to have more peace of mind when I drink my tap
8 water and am otherwise exposed to it."

9 Did I read that correctly?

10 A. Yes.

11 Q. How do you reduce your risk of PFAS --
12 exposure to PFAS?

13 A. I'm not aware of anything I can personally do
14 other than stop drinking the water.

15 Q. Okay. And Paragraph 18 of your declaration
16 states that "If Chemours complied with its permit
17 limits for PFOA and HFPO-DA at Washington Works, I
18 would be less concerned about PFAS exposure in my tap
19 water and my use and enjoyment of my water would
20 increase."

21 Did I read that correctly?

22 A. Yes.

23 Q. I thought when I asked you earlier that if
24 Chemours would have no future Clean Water Act

1 MR. SNYDER: Objection. Relevancy.
2 Mr. Engle's been withdrawn. Go ahead and answer,
3 Mr. Fowler.

4 A. I do not.

5 Q. Okay.

6 Okay. Paragraph 11, the second sentence
7 of Paragraph 11 says that "The use and enjoyment of the
8 Ohio River by plaintiffs members including Ms. Robinson
9 and Mr. Engle are adversely affected by Chemours'
10 unlawful discharges."

11 Did I read that correctly?

12 A. Yes.

13 Q. Are you aware of any adverse effects -- or
14 excuse me. Are you aware of any use and enjoyment or
15 adverse effects of any members of West Virginia Rivers
16 Coalition, including yourself, other than what we have
17 discussed today already?

18 MR. SNYDER: Objection. Calls for
19 speculation. Facts not in evidence. What members?

20 MR. FORD: I'm asking him if he's aware.
21 He can say "no" if he -- you know, I'm not asking him
22 to speculate at all.

23 MR. SNYDER: Same objections.

24 Mr. Fowler, you can answer if you can. Calls for a

1 discussed already today; correct?

2 A. Correct.

3 Q. Okay. Do you know an individual named
4 Jonathan Shefftz, S-H-E-F-F-T-Z?

5 A. I do not.

6 Q. Okay. Do you know an individual that's -- by
7 the name of Dr. Jennifer Schlezinger?

8 A. I do not.

9 Q. Do you know a Dr. Beth Hoagland?

10 A. Was that Beth or Ben?

11 Q. Beth. Hoagland?

12 A. I do not.

13 Q. Okay. What about a Doctor Issam Najim? I
14 think I'm saying that close to right.

15 A. I think he's a doctor in Huntington, but
16 that's all I know about that name.

17 Q. Okay. Do you have any reason to believe that
18 using the water in your house that's sourced from the
19 Ohio River will be harmful to you because of the
20 discharges from Washington Works?

21 MR. SNYDER: Objection to the extent it
22 calls for expert testimony. Go ahead and answer if you
23 can, Mr. Fowler.

24 A. I do.

1 Q. And what is your basis for saying that?

2 A. What I've read.

3 Q. Okay. And I think you testified earlier that
4 no one's ever told you that using the water at your --
5 at your home could be harmful to you; correct?

6 MR. SNYDER: Objection.

7 Mischaracterizes. Go ahead and answer.

8 A. With regards to PFOA specifically, no one has
9 told me verbally, no.

10 Q. Okay. And what about for the category of PFAS
11 more generally? Has anyone told you that the PFAS
12 contamination in the Ohio River may be harmful to you
13 because of the water you use in your home?

14 MR. SNYDER: Objection. Calls for expert
15 testimony. Go ahead and answer if you can.

16 A. No.

17 Q. Okay.

18 Let's just take a quick five-minute break
19 and I think I'm done. Let me just look over my notes
20 real quick.

21 MR. SNYDER: Okay.

22 (Break taken.)

23 BY MR. FORD:

24 Q. All right. We're back on the record. Monty,

1 MR. FORD: Yeah, just real quick.

2 BY MR. FORD:

3 Q. Mr. Fowler, in Paragraph 12, you reference
4 that you are aware of West Virginia American Water
5 Huntington system is older and has had problems in the
6 past with treating pollutants. I'm not sure I asked
7 you the first go-around: What problems in the past
8 with treating pollutants are you referencing there?

9 A. I've read stories about them having issues of
10 breakdowns and trying to deal with newer pollutants. I
11 think that was specifically what came to mind was the
12 water crisis in Charleston a few years ago when
13 everybody's water downstream tasted and smelled like
14 licorice or something off and that was an issue in
15 Huntington as well.

16 Q. Okay. Are you aware whether West Virginia
17 American Water's Huntington system has had any problems
18 with treating PFAS in the past?

19 A. I am not.

20 Q. Okay. Mr. Snyder was asking you some
21 questions about your understanding of the Clean Water
22 Act permit for Washington Works. For the Washington
23 Works facility. Do you recall that testimony a minute
24 ago?

1 A. Yes.

2 Q. Do you know what the limits are for PFOA set
3 in that permit?

4 A. I do not.

5 Q. Do you know what the limits for HFPO-DA or
6 dimer acid or GenX are as set by that permit?

7 A. I do not.

8 Q. Okay. I don't have anything further.

9 MR. SNYDER: Okay. Teri, we'll review
10 and sign. We can go off the record.

11 (Signature not waived.)

12 (Concluded at 11:09 AM.)

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1 STATE OF WEST VIRGINIA,
2 COUNTY OF WOOD, to wit;
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4 I, Teresa Reedy, a Notary Public within and
5 for the County and State aforesaid, duly commissioned
6 and qualified, do hereby certify that the foregoing
7 deposition of MONTY FOWLER was duly taken by me and
before me at the time and place and for the purpose
specified in the caption hereof, the said witness
having been by me first duly sworn.

8 I further certify that the attached deposition
9 transcript meets the requirements set forth within
10 Article 27, Chapter 47 of the West Virginia Code to the
best of my ability.

11 I do further certify that the said deposition
12 was correctly taken by me in shorthand notes, and that
13 the same were accurately written out in full and
reduced to typewriting and that the witness did request
to read his transcript.

14 I further certify that I am neither attorney
15 or counsel for, nor related to or employed by, any of
16 the parties to the action in which this deposition is
17 taken, and further that I am not a relative or employee
of any attorney or counsel employed by the parties or
financially interested in the action and that the
attached transcript meets the requirements set forth
within article twenty-seven, chapter forty-seven of the
West Virginia Code.

18 My commission expires March 13, 2028. Given
19 under my hand this 3rd day of August, 2025.
20

21 Teresa L. Reedy, RPR
22
23
24